

BEYS, STEIN & MOBARGHA LLP

Jason H. Berland

VIA ECF

July 11, 2012

Honorable Arthur D. Spatt
United States District Court
100 Federal Plaza
P.O. Box 9014
Central Islip, New York 11722

Re: United States v. Daniel Greenberg, 12-CR-301 (ADS)

Dear Judge Spatt:

I represent the defendant Daniel Greenberg in the above referenced case, and write to request permission from the Court for Mr. Greenberg to temporarily travel outside of New York State despite the current prohibition in his bail agreement.

Mr. Greenberg would like permission to visit two of his young children, Emily and Joseph, for a few hours at their overnight camp, Camp Morasha, in Pennsylvania. The camp is located at 274 High Lake Road, Lakewood, Pennsylvania. Mr. Greenberg would like to visit his children on either July 31, 2012 or August 1, 2012.

Both the Assistant United States Attorney handling this case and Mr. Greenberg's pre-trial services officer have been notified of this request.

The Chrysler Building
405 Lexington Avenue
7th Floor
New York, New York 10174
646.755.3604 (Direct)
646.755.3599 (Fax)
jberland@beyssstein.com

July 11, 2012

Page 2

Please advise me if any additional information is needed to assist the Court in coming to a determination. Thank you for considering Mr. Greenberg's request.

Respectfully Submitted,

/s/
Jason H. Berland, Esq. (JB4136)
Attorney for Defendant Daniel Greenberg

cc: Assistant United States Attorney Sarah Coyne (Via ECF)